

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

HILTON HEE CHONG, PAUL J.  
BURROUGHS and RICHARD  
O'DRISCOLL, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

KPMG, LLP, THE BOARD OF  
DIRECTORS OF KPMG, LLP, THE  
KPMG PENSION STRATEGY AND  
INVESTMENT COMMITTEE and JOHN  
DOES 1-30.

Defendants.

CIVIL ACTION NO.: 2:21-cv-19330

**[PROPOSED] ORDER AWARDING PLAINTIFFS' COUNSEL ATTORNEYS'  
FEES AND REIMBURSEMENT OF EXPENSES AND  
PLAINTIFFS' CASE CONTRIBUTION AWARDS**

This matter having come before the Court on July 22, 2024, on the application of Class Counsel for an award of attorneys' fees and reimbursement of expenses incurred in the Action and for Case Contribution Awards for Plaintiffs, having considered all papers filed and proceedings conducted herein, having found the settlement for this Action to be fair, reasonable and adequate and otherwise being fully informed in the premises and good cause appearing therefore:

**IT IS HEREBY ORDERED AND ADJUDGED:**

and for the reasons  
set forth  
on the  
record in  
July 22,  
2024;  
and for  
good cause  
shown;

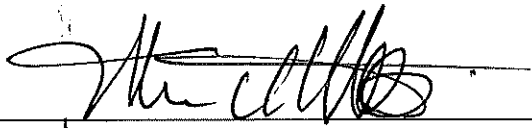
1. All of the capitalized terms used herein shall have the same meanings as set forth in the Class Action Settlement Agreement ("Settlement Agreement") executed March 3, 2024, and filed with the Court.

2. This Court has jurisdiction over the subject matter of this application and all matters relating thereto, including all members of the Settlement Class.

3. Plaintiffs' Class Counsel are hereby awarded attorneys' fees of \$ 216,645.00 and reimbursement of expenses in the sum of \$ 56,845.26 (the "Attorneys' Fees and Expenses"), to be paid from the Gross Settlement Amount. The Court finds that the amount of fees awarded is appropriate and that the amount of fees awarded are fair and reasonable given the substantial risks of non-recovery, the time and effort involved, and the result obtained for the Settlement Class.

4. Each of the Named Plaintiffs is awarded \$10,000.00 as a Case Contribution Award, as defined in the Settlement Agreement, in recognition of their contributions to this Action.

SO ORDERED this 22<sup>nd</sup> day of July, 2024.

  
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U.S. Magistrate Judge Michael A. Hammer